

FILED/ACCEPTED

MAR 23 2012

Before the
Federal Communications Commission
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In re

MARITIME COMMUNICATIONS/LAND
MOBILE, LLC

Participant in Auction No. 61 and Licensee of
Various Authorizations in the Wireless Radio
Services

Applicant for Modification of Various
Authorizations in the Wireless Radio Services

Applicant with ENCANA OIL AND GAS (USA),
INC.; DUQUESNE LIGHT COMPANY; DCP
MIDSTREAM, LP; JACKSON COUNTY
RURAL MEMBERSHIP ELECTRIC
COOPERATIVE; PUGET SOUND ENERGY,
INC.; ENBRIDGE ENERGY COMPANY,
INC.; INTERSTATE POWER AND LIGHT
COMPANY; WISCONSIN POWER AND
LIGHT COMPANY; DIXIE ELECTRIC
MEMBERSHIP CORPORATION, INC.;
ATLAS PIPELINE – MID CONTINENT, LLC;
DENTON COUNTY ELECTRIC
COOPERATIVE, INC., DBA COSERV
ELECTRIC; AND SOUTHERN CALIFORNIA
REGIONAL RAIL AUTHORITY

EB Docket No. 11-71
File No. EB-09-IH-1751
FRN: 0013587779

Application File Nos. 0004030479,
0004144435, 0004193028, 0004193328,
0004354053, 0004309872, 0004310060,
0004314903, 0004315013, 0004430505,
0004417199, 0004419431, 0004422320,
0004422329, 0004507921, 0004153701,
0004526264, 0004636537,
and 0004604962

To: Marlene H. Dortch, Secretary

Attention: Chief Administrative Law Judge Richard L. Sippel

**ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE A REPLY TO
MARITIME'S STATUS REPORT AND RESPONSE**

1. On March 22, 2012, Maritime Communications/Land Mobile, LLC (Maritime)
filed its Status Report on Discovery and Response to the Enforcement Bureau's Request for the

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Presiding Judge's Intervention (Response).¹ The Enforcement Bureau (Bureau) requested the Presiding Judge's intervention to address continuing deficiencies in Maritime's responses to Interrogatory Nos. 13, 14 and 15 of the "Joint Interrogatories to Maritime Relating to Nonconstruction and Discontinuance of Site-Based Operations."² Maritime's Response to the Bureau's Intervention Request obscures the relevant facts.

2. The Bureau believes it is in the public interest for the Presiding Judge to have an accurate record as he considers the issues raised in the Bureau's Intervention Request. Accordingly, the Bureau hereby respectfully requests leave to file a reply to Maritime's Status Report and Response, filed concurrently with this Motion.

3. For the foregoing reasons, the Bureau respectfully asks the Presiding Judge to grant the Bureau's motion for leave to file a reply to Maritime's pleading.

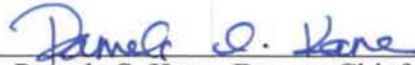
¹ See Maritime's Status Report on Discovery and Response to the Enforcement Bureau's Request for the Presiding Judge's Intervention, filed on March 22, 2012.

² See Enforcement Bureau's Status Report On Maritime's Discovery Deficiencies And Request For Presiding Judge's Intervention (Intervention Request), filed on March 20, 2012.

Respectfully submitted,

P. Michele Ellison

Chief, Enforcement Bureau



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March 23, 2012

CERTIFICATE OF SERVICE

Makia Day, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 23rd day of March, 2012, sent by first class United States mail copies of the foregoing "ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE A REPLY TO MARITIME'S STATUS REPORT AND RESPONSE" to:

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